

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JEWELL WEEKES, individually, and on behalf of all others similarly situated,)	Case No. 1:23-cv-10817-NMG
)	
Plaintiff,)	
)	
v.)	
)	
COHEN CLEARY, P.C.,)	
)	
Defendant.)	

**PLAINTIFF’S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT**

Plaintiff Jewell Weekes (“Plaintiff”), by and through her undersigned counsel, respectfully move this Court, before the Honorable Nathaniel M. Gorton, United States District Judge, at the United States District Court, District of Massachusetts, 1 Courthouse Way, Boston, Massachusetts, for an Order granting Plaintiff’s Motion for Preliminary Approval of the Class Action Settlement with Defendant Cohen Cleary, P.C. (“Defendant”) and the other relief set forth in the Proposed Order filed herewith.

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiff hereby moves for entry of an Order: (1) granting Preliminary Approval of the Settlement; (2) provisionally certifying the proposed Settlement Class; (3) conditionally appointing the proposed Class Representative as the Settlement Class Representative; (4) conditionally appointing Cole Van Note as the Settlement Class Counsel; (5) approving the form and manner of notice; (6) ordering that notice be disseminated to the Settlement Class according to the Settlement’s terms; (7) establishing the deadlines for Settlement Class Members to request exclusion from the Settlement Class, file objections to the Settlement, or file Claims for a Settlement Award; and (8) setting the proposed schedule for completion of further settlement proceedings, including scheduling the Final

Approval Hearing. This Motion is based upon the record in this case as well as the: (1) Memorandum of Law in Support of Plaintiff's Motion for Preliminary Approval of the Class Action Settlement; (2) Declaration of Laura Van Note, Esq. in Support of Plaintiff's Motion for Preliminary Approval of Amended Class Action Settlement and (3) Declaration of Julie Green Claims Administrator Regarding the Notice Plan and Administration, as well as any additional materials and argument that may be presented to the Court.

Date: January 30, 2025

By: /s/ Laura Grace Van Note
Laura Van Note, Esq. (CA S.B. # 310160)*
COLE & VAN NOTE
555 12th Street, Suite 2100
Oakland, CA 94607
Telephone: (510) 891-9800
Email: lvn@colevannote.com

Steven A. Schwartz, Esq. (BBO #560066)
JOEL D. SCHWARTZ, P.C.
1 Washington Mall, 16
Boston, MA 02108
Phone: (617) 600-0439
Email: sas@joelhschwartz.com

Daniel Srourian, Esq. (C.A. S.B. #285678)*
SROURIAN LAW FIRM, P.C.
3435 Wilshire Boulevard, Suite 1710
Los Angeles, CA 90010
Telephone: (213) 474-3800
Email: daniel@slfla.com

**Admitted Pro Hac Vice*

Attorneys for Plaintiff and the Plaintiff Class

LOCAL RULE 7.1(A)(2) CERTIFICATION

I, Laura Van Note, counsel for Plaintiff, certifies that Plaintiff's conferred with counsel for Defendants Cohen Cleary P.C., and they have no objection to this motion being filed and the relief requested herein.

/s/ Laura Grace Van Note
Laura Van Note, Esq.

CERTIFICATE OF SERVICE

I hereby certify that, on January 30, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served today on all counsel of record in this case via transmission of Notice of Electronic Filing generated by CM/ECF and on counsel in the related cases to their respective emails per the below service list.

/s/Laura Grace Van Note
Laura Grace Van Note, Esq.